

---

**From:** carterj@carterarbitration.com  
**Sent:** Thursday, August 25, 2022 11:36 AM  
**To:** 'Denton Nichols'; 'Diana E. Marshall'; 'James Hosking'  
**Cc:** RafaelCarmona@adr.org; 'Joseph M. Graham Jr.'; 'Kevin O'Gorman'; 'Julie Searle'; 'Geraldine W. Young'; 'M. Miles Robinson'; 'Erin Formby'; 'Lilly MacDonald'; Mark McNeill; Silpa Maruri; Christopher Porter; Dominic Pody  
**Subject:** RE: LImetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

[EXTERNAL EMAIL from [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com)]

---

Thanks to you both for this assistance.

**From:** Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>  
**Sent:** Thursday, August 25, 2022 10:24 AM  
**To:** carterj@carterarbitration.com; 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>  
**Cc:** RafaelCarmona@adr.org; Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; Lilly MacDonald <[lilly.macdonald@nortonrosefulbright.com](mailto:lilly.macdonald@nortonrosefulbright.com)>; Mark McNeill <[markmcneill@quinnemanuel.com](mailto:markmcneill@quinnemanuel.com)>; Silpa Maruri <[silpamaruri@quinnemanuel.com](mailto:silpamaruri@quinnemanuel.com)>; Christopher Porter <[chrisporter@quinnemanuel.com](mailto:chrisporter@quinnemanuel.com)>; Dominic Pody <[dominicpody@quinnemanuel.com](mailto:dominicpody@quinnemanuel.com)>  
**Subject:** RE: LImetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

Dear Members of the Tribunal,

Respondent and Counterclaimant UNIPEC America, Inc. likewise has no objection to the extension of time for the award until September 14, 2022, as set forth in the Chairman's email received moments ago.

Respectfully submitted,

Denton Nichols

*Counsel for UNIPEC America, Inc.*

**Denton Nichols | Partner**  
Norton Rose Fulbright US LLP  
1301 McKinney, Suite 5100, Houston, Texas 77010-3095, United States  
Tel +1 713 651 8304 | Fax +1 713 651 5246  
[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** Dominic Pody <[dominicpody@quinnmanuel.com](mailto:dominicpody@quinnmanuel.com)>

**Sent:** Thursday, August 25, 2022 9:22 AM

**To:** [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com); Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>; 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>; Mark McNeill <[markmcneill@quinnmanuel.com](mailto:markmcneill@quinnmanuel.com)>; Silpa Maruri <[silpamaruri@quinnmanuel.com](mailto:silpamaruri@quinnmanuel.com)>; Christopher Porter <[chrisporter@quinnmanuel.com](mailto:chrisporter@quinnmanuel.com)>

**Cc:** [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org); Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)

**Subject:** RE: Limetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

Dear Chairman Carter,

Claimant Limetree Bay Terminals has no objection to the Tribunal's request for an extension of time to issue the Award to September 14, 2022.

Respectfully submitted,

Dominic

**Dominic Pody** | Associate | Quinn Emanuel Urquhart & Sullivan, LLP  
Cell: 215.499.6446

---

**From:** [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com)

**Sent:** Thursday, August 25, 2022 9:19 AM

**To:** [Dominic Pody](mailto:Dominic.Pody@adr.org); '[Denton Nichols](mailto:Denton.Nichols@adr.org)'; '[Diana E. Marshall](mailto:Diana.E.Marshall@adr.org)'; '[James Hosking](mailto:James.Hosking@adr.org)'; '[Mark McNeill](mailto:Mark.McNeill@adr.org)'; '[Silpa Maruri](mailto:Silpa.Maruri@adr.org)'; '[Christopher Porter](mailto:Christopher.Porter@adr.org)

**Cc:** [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org); '[Joseph M. Graham Jr.](mailto:Joseph.M.Graham.Jr@adr.org)'; '[Kevin O'Gorman](mailto:Kevin.O.Gorman@adr.org)'; '[Julie Searle](mailto:Julie.Searle@adr.org)'; '[Geraldine W. Young](mailto:Geraldine.W.Young@adr.org)'; '[M. Miles Robinson](mailto:M.Miles.Robinson@adr.org)'; '[Erin Formby](mailto:Erin.Formby@adr.org)'; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)

**Subject:** RE: Limetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

[EXTERNAL EMAIL from [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com)]

Dear Counsel,

Due to late summer scheduling difficulties, it would be helpful to the arbitrators if the parties are willing to extend the deadline for delivery of the award in this case for an additional two weeks, to September 14, 2022.

Sincerely, James H. Carter

---

**From:** Dominic Pody <[dominicpody@quinnmanuel.com](mailto:dominicpody@quinnmanuel.com)>

**Sent:** Tuesday, July 12, 2022 6:19 PM

**To:** Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>; [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com); 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>; Mark McNeill <[markmcneill@quinnmanuel.com](mailto:markmcneill@quinnmanuel.com)>; Silpa Maruri <[silpamaruri@quinnmanuel.com](mailto:silpamaruri@quinnmanuel.com)>; Christopher Porter <[chrisporter@quinnmanuel.com](mailto:chrisporter@quinnmanuel.com)>

**Cc:** [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org); Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)

**Subject:** RE: Limetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

Dear Members of the Tribunal and Counsel,

Claimant Limetree Bay Terminals has no objection to the Tribunal's request for an extension of time to issue the Award to August 31, 2022.

Respectfully submitted,  
Dominic

**Dominic Pody** | Associate | Quinn Emanuel Urquhart & Sullivan, LLP  
Cell: 215.499.6446

---

**From:** Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>  
**Sent:** Tuesday, July 12, 2022 5:55 PM  
**To:** [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com); 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>; Mark McNeill <[markmcneill@quinnmanuel.com](mailto:markmcneill@quinnmanuel.com)>; Silpa Maruri <[silpamaruri@quinnmanuel.com](mailto:silpamaruri@quinnmanuel.com)>; Dominic Pody <[dominicpody@quinnmanuel.com](mailto:dominicpody@quinnmanuel.com)>; Christopher Porter <[chrisporter@quinnmanuel.com](mailto:chrisporter@quinnmanuel.com)>  
**Cc:** [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org); Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)  
**Subject:** RE: Limetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

[EXTERNAL EMAIL from [denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)]

Dear Members of the Tribunal and Counsel,

This email is being sent in order to re-circulate my previous email below, which was evidently sent to incorrect email addresses for Mr. McNeill and Ms. Maruri.

Respectfully submitted,

Denton Nichols

*Counsel for UNIPEC America, Inc.*

**Denton Nichols** | Partner  
Norton Rose Fulbright US LLP  
1301 McKinney, Suite 5100, Houston, Texas 77010-3095, United States  
Tel +1 713 651 8304 | Fax +1 713 651 5246  
[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)

**NORTON ROSE FULBRIGHT**

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>  
**Sent:** Tuesday, July 12, 2022 4:50 PM  
**To:** [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com); 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>  
**Cc:** [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org); [markmcneil@quinnmanuel.com](mailto:markmcneil@quinnmanuel.com); [silpamaruri@quinnmanuel.com](mailto:silpamaruri@quinnmanuel.com);

[dominicpody@quinnemanuel.com](mailto:dominicpody@quinnemanuel.com); [chrisporter@quinnemanuel.com](mailto:chrisporter@quinnemanuel.com); Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)

**Subject:** RE: LImetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

Dear Members of the Tribunal,

Respondent and Counterclaimant UNIPEC America, Inc. has no objection to the extension of time set forth in the Chairman's email received moments ago.

Respectfully submitted,

Denton Nichols

*Counsel for UNIPEC America, Inc.*

**Denton Nichols | Partner**  
Norton Rose Fulbright US LLP  
1301 McKinney, Suite 5100, Houston, Texas 77010-3095, United States  
Tel +1 713 651 8304 | Fax +1 713 651 5246  
[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)

## NORTON ROSE FULBRIGHT

*Law around the world*  
[nortonrosefulbright.com](http://nortonrosefulbright.com)

---

**From:** [carterj@carterarbitration.com](mailto:carterj@carterarbitration.com) <[carterj@carterarbitration.com](mailto:carterj@carterarbitration.com)>  
**Sent:** Tuesday, July 12, 2022 4:39 PM  
**To:** [markmcneil@quinnemanuel.com](mailto:markmcneil@quinnemanuel.com); [silpamauri@quinnemanuel.com](mailto:silpamauri@quinnemanuel.com); [dominicpody@quinnemanuel.com](mailto:dominicpody@quinnemanuel.com); [chrisporter@quinnemanuel.com](mailto:chrisporter@quinnemanuel.com); Joseph M. Graham Jr. <[joseph.graham@nortonrosefulbright.com](mailto:joseph.graham@nortonrosefulbright.com)>; Kevin O'Gorman <[kevin.ogorman@nortonrosefulbright.com](mailto:kevin.ogorman@nortonrosefulbright.com)>; Julie Searle <[julie.searle@nortonrosefulbright.com](mailto:julie.searle@nortonrosefulbright.com)>; Geraldine W. Young <[geraldine.young@nortonrosefulbright.com](mailto:geraldine.young@nortonrosefulbright.com)>; Denton Nichols <[denton.nichols@nortonrosefulbright.com](mailto:denton.nichols@nortonrosefulbright.com)>; M. Miles Robinson <[miles.robinson@nortonrosefulbright.com](mailto:miles.robinson@nortonrosefulbright.com)>; Erin Formby <[erin.formby@nortonrosefulbright.com](mailto:erin.formby@nortonrosefulbright.com)>; [lily.macdonald@nortonrosefulbright.com](mailto:lily.macdonald@nortonrosefulbright.com)  
**Cc:** 'Diana E. Marshall' <[demarshall@marshalllewisllp.com](mailto:demarshall@marshalllewisllp.com)>; 'James Hosking' <[James.Hosking@chaffetzlindsey.com](mailto:James.Hosking@chaffetzlindsey.com)>; [RafaelCarmona@adr.org](mailto:RafaelCarmona@adr.org)  
**Subject:** LImetree Bay Terminals, LLC v. Unipec America, Inc., ICDR Case No. 01-20-0014-7261

### [External Email – Use Caution]

Dear Counsel,

The deadline for the Final Award in this case has been agreed to be August 9, 2022. As a result of arbitrator schedules during the month of July, it has become apparent that our work would benefit from a short extension of that time, to August 31, 2022, if the parties are prepared to agree to that change. It is, of course, entirely within the parties' discretion.

Sincerely, James H. Carter

**CONFIDENTIALITY NOTICE:** This email, including any attachments, is confidential and may be privileged. If you are not the intended recipient please notify the sender immediately, and please delete it; you should not copy it or use it for any purpose or disclose its contents to any other person. Norton Rose Fulbright entities reserve the right to monitor all email communications through their networks.

Norton Rose Fulbright Australia, Norton Rose Fulbright LLP, Norton Rose Fulbright Canada LLP, Norton Rose Fulbright South Africa Inc and Norton Rose Fulbright US LLP are separate legal entities and all of them are members of Norton Rose Fulbright Verein, a Swiss verein. Norton Rose Fulbright Verein helps coordinate the activities of the members but does not itself provide legal services to clients. Details of each entity, with certain regulatory information, are available at [nortonrosefulbright.com](http://nortonrosefulbright.com).